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WESTERN DISTRICT OF WASHINGTON  
DEPUTY



11-CV-00222-BOND

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

MICROSOFT CORPORATION,

Plaintiff,

v.

JOHN DOES 1-11 CONTROLLING A  
COMPUTER BOTNET THEREBY  
INJURING MICROSOFT AND ITS  
CUSTOMERS,

Defendants.

Case No.

**C11-0222** *jr*

**COMPLAINT**

**\*\*FILED UNDER SEAL\*\***

Plaintiff MICROSOFT CORP. ("Microsoft") hereby complains and alleges that JOHN DOES 1-11 ("Defendants") are controlling an illegal, notorious, and world-wide computer network known as the "Rustock botnet," made up of end-user computers connected to the Internet, which Defendants have infected with malicious software, and which Defendants consequently can and do direct and control for nefarious and illegal purposes through servers connected to the Internet.

**NATURE OF ACTION**

1. This is an action based upon: (1) the Computer Fraud and Abuse Act (18 U.S.C. § 1030), (2) CAN-SPAM Act (15 U.S.C. § 7704), (3) trademark infringement under the

COMPLAINT

Orrick Herrington & Sutcliffe LLP  
701 5th Avenue, Suite 5600  
Seattle, Washington 98104-7097  
tel+1-206-839-4300

Summons issued SEA039572

1 Lanham Act (15 U.S.C. § 1114), (4) false designation of origin under the Lanham Act (15  
 2 U.S.C. § 1125(a)), (5) trademark dilution under the Lanham Act (15 U.S.C. 1125(c)), (6)  
 3 common law trespass to chattels, (7) common law conversion, and (8) unjust enrichment.  
 4 Microsoft seeks injunctive and other equitable relief and damages against Defendants for their  
 5 creation and ongoing use of the "Rustock" Botnet, which has caused and continues to cause  
 6 irreparable injury to Microsoft, its customers and the public.

### 7 PARTIES

8 2. Plaintiff Microsoft is a corporation duly organized and existing under the laws of  
 9 the State of Washington, having its headquarters and principal place of business in Redmond,  
 10 Washington.

11 3. The Defendants control server software operating from and through the  
 12 Command and Control IP Addresses/Domains set forth at Appendices A and B, which is used  
 13 to cause harm to Microsoft, its customers and the public.

14 4. Microsoft is unaware of the true names and capacities of the Defendants sued  
 15 herein as John Does 1-11, inclusive, and therefore sues these Defendants by such fictitious  
 16 names. Defendants own, operate and control the Rustock Botnet from and through the  
 17 Command and Control IP Addresses/Domains set forth at Appendices A and B.

18 5. Microsoft will amend this complaint to allege the Defendants' true names and  
 19 capacities when ascertained. Microsoft will exercise due diligence to determine Defendants'  
 20 true names, capacities and contact information, and to effect service upon those Defendants.

21 6. Microsoft is informed and believes and therefore alleges that each of the  
 22 fictitiously named Defendants is responsible in some manner for the occurrences herein alleged,  
 23 and that Microsoft's injuries as herein alleged were proximately caused by such Defendants.

24 7. The servers located at or hosting the Command and Control IP  
 25 Addresses/Domains are maintained by the companies set forth at Appendices A and B to this  
 26 Complaint.

27 8. The actions and omissions alleged herein to have been undertaken by the  
 28 Defendants were undertaken by each Defendant individually, were actions and omissions that

each Defendant authorized, controlled, directed, or had the ability to authorize, control or direct, and/or were actions and omissions each Defendant assisted, participated in, or otherwise encouraged, and are actions for which each Defendant is liable. Each Defendant aided and abetted the actions of the Defendants set forth below, in that each Defendant had knowledge of those actions and omissions, provided assistance and benefited from those actions and omissions, in whole or in part. Each of the Defendants was the agent of each of the remaining Defendants, and in doing the things hereinafter alleged, was acting within the course and scope of such agency and with the permission and consent of other Defendants.

### **JURISDICTION AND VENUE**

9. This action arises out of Defendants' violation of the Federal Computer Fraud and Abuse Act (18 U.S.C. § 1030), CAN-SPAM Act (15 U.S.C. § 7704) and the Lanham Act (15 U.S.C. §§ 1114, 1125(a), (c)). Therefore, the Court has subject matter jurisdiction over this action based on 28 U.S.C. § 1331. This is also an action for trespass to chattels, unjust enrichment and conversion. Accordingly, this Court has subject matter jurisdiction under 28 U.S.C. § 1367.

10. Defendants have directed acts complained of herein toward Washington, have utilized instrumentalities located in Washington to carry out the acts alleged in this Complaint, and engage in other conduct availing themselves of the privilege of conducting business in Washington. In particular, Defendants have used server software operating from and through the Command and Control IP Addresses/Domains to control a network of compromised user computers, called a "botnet," which is used by Defendants to conduct illegal activities, thereby causing harm to Microsoft as well as Microsoft's customers and other members of the public in Washington.

11. Defendants have directed actions at Washington, including specifically the Western District of Washington, by directing malicious computer code at the computers of individual users located in Washington and the Western District of Washington specifically, infecting those user computers with the malicious code and thereby making the user computers part of the "botnet," which is used to injure Microsoft, its customers and the public. Figure 1

This map displays the Pacific Northwest region, covering parts of British Columbia, Canada, and Washington, Oregon, and Idaho, United States. Major cities such as Vancouver, Seattle, Portland, and Boise are labeled. The map includes a network of roads and highways, with some routes highlighted in red. Geographical features like the Strait of Juan de Fuca, Puget Sound, and various rivers are also shown.

13. Pursuant to 28 U.S.C. § 1391(b), venue is proper in this judicial district. A substantial part of the events or omissions giving rise to Microsoft's claims, together with a substantial part of the property that is the subject of Microsoft's claims, are situated in this judicial district. Venue is proper in this judicial district under 28 U.S.C. § 1391(c) because the Defendants are subject to personal jurisdiction in this judicial district.

**A. Rustock's Architecture Provides A Platform For World-Wide Illegal Activity**

14. Botnets are networks made up of tens of thousands and sometimes, as is the case with Rustock, over one million infected end-user computers around the world. Malicious actors often use botnets because of their ability to support a wide range of illegal conduct, their resilience

1 against attempts to disable them, and their ability to conceal the identities of the malefactors  
2 controlling them. They provide a very efficient general means of controlling huge numbers of  
3 computers and targeting any action internally against the contents of those computers or externally  
4 against any computer on the Internet.

5 15. Rustock is a "botnet" and is made up of end-user computers that have been  
6 infected, via the Internet, with malicious software ("malware") that places them under the control  
7 of Defendants, who use the infected end-user computers for a variety of illegal activities. Rustock  
8 significantly harms Microsoft, its customers, and the public, and if allowed to continue operating,  
9 will only increase the damage it inflicts.

10 16. Rustock has a multi-tier architecture. The lowest tier, the "Infection Tier," consists  
11 of approximately one million Rustock-infected end-user computers. The Infection Tier performs  
12 Rustock's daily illegal activities, such as sending out enormous volumes of spam e-mail. The  
13 middle tier in Rustock's architecture, the "Control Tier," consists of specialized Command and  
14 Control Servers that relay commands and information to the Rustock-infected end-user computers  
15 in the Infection Tier. On information and belief, the top tier in Rustock's architecture, the  
16 "Command Tier," which is effectively obscured behind the Control Tier, is made up of the  
17 computers that Defendants use to control and direct the Command and Control Servers. This  
18 hierarchical architecture is depicted in Figure 2.

19 **Figure 2**

20

21

22

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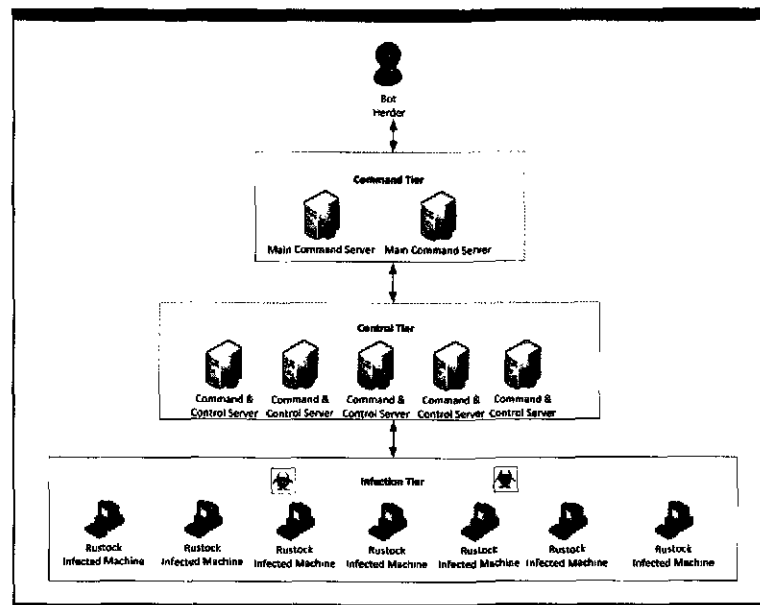
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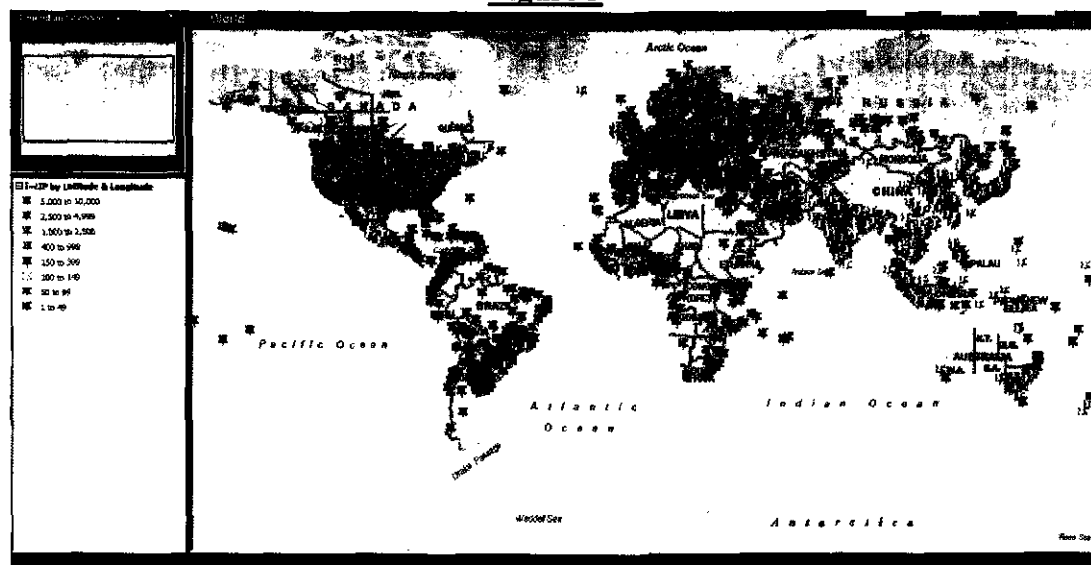
28



## 2. The Infection Tier

17. The Infection Tier in the Rustock architecture is made up of a large number of Rustock-infected end-user computers of the type commonly found in businesses, living rooms, schools, libraries, and Internet cafes around the world. For example, between January 22, 2011 and February 4, 2011, Microsoft detected that Rustock-infected end-user computers connected to the Internet from over 1,300,000 unique IP addresses around the world. The locations of these addresses world-wide are shown in Figure 3.

**Figure 3**



18. Analysis by Microsoft and independent researchers indicates that Rustock uses

1 several methods to infect end-user computers. One method involves using malware known as a  
2 “Trojan downloader” that infects the end-user computer with Rustock malware, often along with  
3 other types of malware that, upon information and belief, are used to steal the user’s confidential  
4 information and/or enlist his or her computer in other illegal conduct. In general, Defendants are  
5 constantly engaged in infecting additional end-user computers with Rustock malware. To counter  
6 them, numerous software providers and software security firms are constantly engaged in trying to  
7 disinfect those computers. However, this is a complex task: owners of infected computers would  
8 need to undertake a specific investigation to even become aware of the infection, something many  
9 consumers are unable to undertake independently.

10 19. Reliable analyses estimate that there are *upwards of one million* Rustock-infected  
11 end-user computers in the world. Defendants direct these Rustock-infected end-user computers to  
12 generate and send out a staggering volume of unsolicited bulk e-mail, commonly known as  
13 “spam.” For example, in one 45 minute period on January 25, 2010, Microsoft’s investigative  
14 team directly observed a single Rustock-infected end-user computer generate approximately 7,500  
15 spam messages. At various times in 2010, Rustock was credited with generating between 20%  
16 and 60% of all spam on the Internet. Recent data shows that Rustock’s capacity to send out  
17 massive volumes of spam remains strong.

18 20. The vast majority of Rustock-generated spam e-mails promote counterfeit or  
19 unapproved generic pharmaceuticals from unlicensed and unregulated on-line drug-sellers. A  
20 large number of Rustock’ spam e-mails use the trademarks of a well-known pharmaceutical  
21 manufacturer, Pfizer, Inc. to promote counterfeit pharmaceuticals. Still other Rustock spam e-  
22 mail used *both* Pfizer’s and Microsoft’s trademarks to promote these pharmaceuticals. Other  
23 Rustock spam samples used Microsoft’s “Microsoft,” “Hotmail,” and “Windows” trademarks (the  
24 “Microsoft Marks”) to lure recipients into a confidence scam known as “advance fee fraud,” in  
25 which spammers attempt to convince recipients that they’ve won a lottery and that they need to  
26 send the spammers some amount of money to collect the larger lottery winnings. On information  
27 and belief, most, if not all, owners of Rustock-infected end-user computers are unaware that their  
28 computers are infected and operating as part of the Rustock botnet, or that their computers are



1 sending out spam messages.

2 **3. The Defendants Command The Rustock-Infected End-User Computers**  
 3 **Through the Control Tier**

4 21. The second level of the botnet, the Control Tier, is comprised of Command and  
 5 Control Servers<sup>1</sup> that, upon information and belief, Defendants have purchased or leased and  
 6 which they use to relay commands to control the Rustock-infected end-user computers of the  
 7 Infection Tier. There are presently approximately 96 Rustock Command and Control Servers  
 8 operating on the Internet. The number and locations of the Command and Control Servers may  
 9 change over time, and Microsoft and other security-researchers monitor Rustock to detect these  
 10 changes.

11 22. The Rustock Command and Control Servers send Rustock-infected end-user  
 12 computers information and instructions over the Internet that force the Rustock-infected end-user  
 13 computers to send out spam messages without the knowledge, approval, or involvement of the  
 14 end-users. On information and belief, the spam sent out by Rustock-infected end-user computers  
 15 is based on "spam-templates" or resource files that the end-user computers receive from the  
 16 Rustock Command and Control Servers.<sup>2</sup> On information and belief, spam templates or resource  
 17 files containing Microsoft trademarks are stored on the Rustock Command and Control Servers.  
 18 The Rustock-infected end-user computers use these templates and resource files to generate the  
 19 spam that they send out.

20 23. The Rustock Command and Control Servers listed in Appendix A are located at IP  
 21 addresses that are associated with computers physically located at data centers or web hosting  
 22 companies<sup>3</sup> operated by third-parties in the United States. Defendants have either purchased or

23 <sup>1</sup> The term "Command and Control Servers" refers either to physical server computers in the Command Tier  
 24 completely dedicated to supporting Rustock, or may be Rustock server software running on computers that might  
 25 also be running software that is not connected to Rustock.

26 <sup>2</sup> The term "spam-template" refers to a file that contains what amounts to a pre-written spam message with certain  
 27 information such as the "To" address and the date represented by variables (essentially, placeholders) that can be  
 28 replaced with actual information before sending. The term "resource file" refers to a type of file commonly used in  
 software applications that stores strings of text, images, or other information in a way that can be accessed and used  
 by other software programs.

<sup>3</sup> The term "hosting company" refers to a type of company that specializes in offering computer hardware, software,  
 connection to the Internet, technical support, and other services to companies or individuals seeking to have a website  
 or some other presence on the Internet.



1 leased these computers, or purchased a subscription plan that allows them to run Rustock  
2 command and control software on these computers.

3 **B. RUSTOCK DIRECTLY INJURES MICROSOFT'S CUSTOMERS**

4 **1. Overview of Harm To Microsoft And Its Customers**

5 24. Microsoft is a provider of the Windows operating system, Hotmail e-mail services  
6 and a variety of other software and services. Microsoft has invested substantial resources in  
7 developing high-quality products and services. Due to the high quality and effectiveness of  
8 Microsoft's products and services and the expenditure of significant resources by Microsoft to  
9 market those products and services, Microsoft has generated substantial goodwill with its  
10 customers, has established a strong brand, has developed the Microsoft name and the names of its  
11 products and services into strong and famous world-wide symbols that are well-recognized within  
12 its channels of trade. Microsoft has registered trademarks representing the quality of its products  
13 and services and its brand, including the Microsoft Marks.

14 25. The activities carried out by the Rustock botnet, described in detail above, and the  
15 numerous resulting injuries to the public at large and Microsoft's customers, injure Microsoft and  
16 its reputation, brand and goodwill because users subject to the negative effects of the Rustock  
17 botnet may incorrectly believe that Microsoft is the source of computer problems caused by the  
18 botnet. Microsoft is similarly injured because the botnet directs a large amount of spam e-mail to  
19 users of Microsoft's e-mail services. Microsoft and its customers must bear this heavy burden and  
20 customers may incorrectly believe that Microsoft is to blame for the spam e-mail.

21 **2. Rustock's Unauthorized Intrusion Into Microsoft's Customers'**  
22 **Computers**

23 26. The most direct injury to Microsoft's customers is the installation of the Rustock  
24 malware on their computers without their authorization or knowledge. Rustock malware is  
25 specifically designed to infect and run on computers equipped with the Windows operating  
26 system, which is licensed by Microsoft to end-users. End users' computers can become infected  
27 with Rustock malware through a variety of mechanisms, some of the most common of which are  
28 visiting an infected website where a Trojan downloader designed to download Rustock is staged,

1 or opening an infected attachment to an e-mail.

2       27. The installation of Rustock malware in and of itself damages the user's computer  
3 and the Windows operating system on the user's computer. During the infection of an end-user's  
4 computer, Rustock malware makes changes at the deepest and most sensitive levels of the  
5 computer's operating system including the kernel, registry, and systems files. It installs its own  
6 kernel mode-driver and intercepts and processes various Windows driver-requests. It alters the  
7 behavior of various Windows operating system routines by manipulating various registry key  
8 settings. It replaces Windows files with files of the same name that contain the Rustock malware.  
9 It installs software that it needs to generate spam and to communicate with the Rustock Command  
10 and Control Servers. Microsoft's customers whose computers are infected with Rustock malware  
11 are damaged by these changes to Windows, which alter the normal and approved settings and  
12 functions of the user's operating system, and destabilize it, and which result in the customers'  
13 computers being forcibly drafted into the botnet.

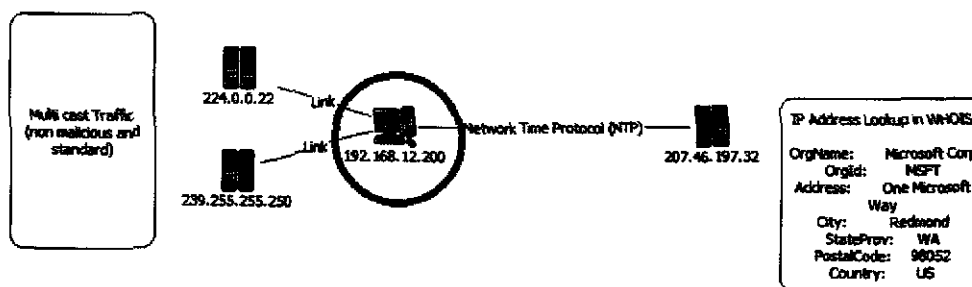
14       28. Customers are usually unaware of the fact that their computers are infected and  
15 have become part of the Rustock botnet. Even if aware of the infection, they lack the technical  
16 resources or skills to solve the problem, allowing their computers to be misused indefinitely.  
17 Even with professional assistance, cleaning a Rustock-infected end-user computer can be  
18 exceedingly difficult, time-consuming, and frustrating.

19               **3. Microsoft Customers' Computers Are Used in Criminal Activity**

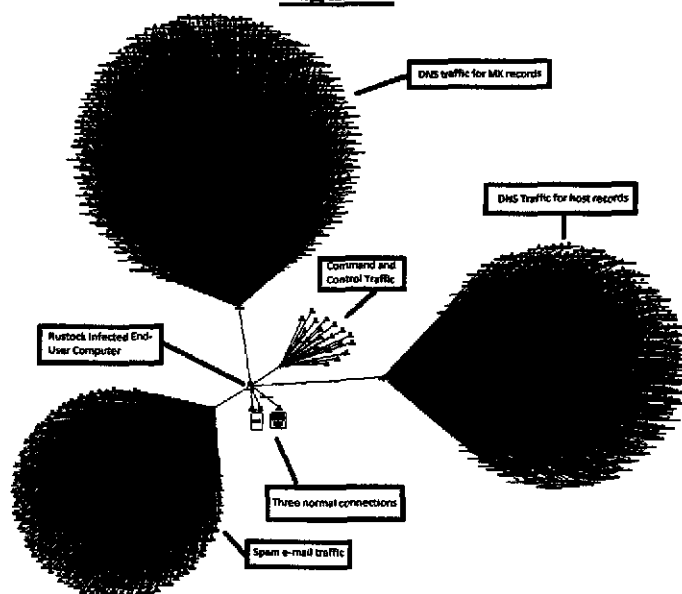
20       29. Once infected with Rustock malware, the end-user's computer is under the control  
21 of the Rustock bot-herder and used by the Defendants for illegal activities. The primary function  
22 of a Rustock-infected end-user computer is to send out a very large quantity of illegal spam e-mail  
23 each day of its operation. Furthermore, the spam e-mails sent out by Rustock-infected end-user  
24 computers illegally infringe the trademarks of Microsoft and other companies. Rustock spam  
25 promotes pharmaceutical products that have been shown to be counterfeit, unlicensed, and  
26 potentially dangerous to purchasers. Customers are harmed by having their computers impressed  
27 into these illegal, harmful, and potentially criminal activities.

1                   4.     **Microsoft's Customers' Computer-Resources Are Utilized for Illicit**  
2                         **Purposes**

3             30.    A Rustock-infected end-user computer's processing power, memory,  
4             communications bandwidth, and other resources are used for the high volume of processing, data  
5             transfer and connections to the Internet that the Rustock-infected end-user computer engages in.  
6             For example, Figure 4 shows the tiny handful of Internet connections made by an uninfected  
7             Windows computer (circled) over the course of almost six hours.

**Figure 4**

31. In contrast, Figure 5 shows the enormous number of Internet connections made in a mere 24 minutes by a Rustock-infected end-user computer. The Rustock-infected end-user computer made the three normal connections of the baseline computer, but in addition, it performed 1406 unique lookups for various DNS "A" hosts on the Internet, 2238 unique lookups for DNS "MX" records for mail servers on the Internet, attempted to send spam e-mail to 1376 e-mail servers on the Internet, including to a number of Hotmail and MSN e-mail account customers; and in addition made 22 connections to Command and Control Servers or other servers on the Internet. The computing power and resources devoted to Rustock's nefarious activities are unavailable for the customer's legitimate uses.

**Figure 5**

1                   **5.     Microsoft Customers Are Directly Targeted by Rustock's Spam**  
 2                   **Campaigns**

3           32.     Microsoft customers are also targeted by Rustock spam campaigns. For example,  
 4 during the four-day period between October 26, 2010 and October 29, 2010, Rustock-infected  
 5 end-user computers sent approximately 34 million e-mails to roughly 50 million Hotmail  
 6 accounts, resulting in an average of approximately eight million spam e-mails per day, providing a  
 7 good approximation of the total amount of Rustock spam sent to Hotmail customer accounts on  
 8 any given day. Approximately 450,000 of these e-mails got through Microsoft's spam filters and  
 9 reached Microsoft's Hotmail customers. The very large amount of spam reaching Microsoft's  
 10 Hotmail customers frustrates them and diminishes their regard for Hotmail and Microsoft. Aside  
 11 from the harm done to Microsoft Hotmail account customers resulting from the sheer volume of  
 12 Rustock spam bombarding their Hotmail accounts, Rustock's spam attempts to lure them into  
 13 confidence schemes hatched by the spammers or other activities that will lead to further potential  
 14 injury, such as purchasing counterfeit or unapproved pharmaceuticals on the Internet.

15           33.     Pharmaceutical counterfeiting, heavily promoted by Rustock, is, in essence, a  
 16 crime of fraud, trick, and deceit. Counterfeiters deceive patients into believing that the products  
 17 they offer are safe and effective medicines from trusted pharmaceutical companies such as Pfizer,  
 18 upon whose integrity they have relied to receive medicines that permit them to live happier and  
 19 healthier lives. In reality, however, counterfeit pharmaceutical products place human lives at  
 20 grave risk. And patients who order pharmaceuticals online in response to spam e-mail promotions  
 21 are particularly likely to place their health at risk.

22                   **6.     Microsoft Pays The Cost Of Protecting Hotmail Account Customers**  
 23                   **From Rustock Spam**

24           34.     Microsoft, as a provider of online e-mail services such as Hotmail, must maintain  
 25 spam filters to stop Rustock spam from reaching its customers. Rustock was acknowledged as the  
 26 largest known spam botnet in the world at its 2010 peak, with an estimated capacity to send over  
 27 40 billion spam e-mails per day, including to users of Microsoft's Hotmail e-mail service. Known  
 28 as the "King of Spam" in the Internet security community at that time, Rustock was estimated to  
 disseminate approximately 40 percent of the world's spam e-mail. While the volume of spam

1 attributed to Rustock fluctuates over time, recent data shows that Rustock is continuing in 2011 as  
 2 major contributor of spam on the Internet. Microsoft Hotmail systems are the target of a  
 3 substantial volume of Rustock spam. The sending of vast amounts of spam e-mail to Microsoft's  
 4 Hotmail e-mail services imposes a burden on Microsoft's Hotmail systems, and requires  
 5 Microsoft to expend substantial resources in an attempt to defend against and mitigate its effects.

6 **7. Microsoft Pays The High Cost of Assisting Customers Whose**  
 7 **Computers Are Infected By Rustock**

8 35. Additionally, Microsoft devotes significant computing and human resources to  
 9 combating Rustock infections and helping customers determine whether or not their computers are  
 10 infected, and if so, cleaning them. Customers' frustration with having to deal with Rustock  
 11 infections on their computers diminishes their regard for Windows and Microsoft, and tarnishes  
 12 Microsoft's reputation and goodwill.

13 **FIRST CLAIM FOR RELIEF**

14 **Violation of the Computer Fraud & Abuse Act, 18 U.S.C. § 1030**

15 36. Microsoft realleges and incorporates by reference the allegations contained in  
 16 paragraphs 1 through 35 above.

17 37. Defendants: (1) knowingly and intentionally accessed Microsoft customers'  
 18 protected computers and Microsoft's protected computers without authorization or in excess of  
 19 any authorization knowingly caused the transmission of a program, information, code and  
 20 commands, and as a result of such conduct intentionally caused damage without authorization  
 21 to the protected computers (18 U.S.C. § 1030(a)(5)(A)); and (2) intentionally accessed the  
 22 protected computers without authorization, and as a result of such conduct caused damage and  
 23 loss (18 U.S.C. § 1030(a)(5)(C)).

24 38. Defendants' conduct has caused a loss to Microsoft during a one-year period  
 25 aggregating at least \$5,000.

26 39. Microsoft has suffered damages resulting from Defendants' conduct.

27 40. Microsoft seeks compensatory and punitive damages under 18 U.S.C. § 1030(g)  
 28 in an amount to be proven at trial.



41. As a direct result of Defendants' actions, Microsoft has suffered and continues to suffer irreparable harm for which Microsoft has no adequate remedy at law, and which will continue unless Defendants' actions are enjoined.

## **SECOND CLAIM FOR RELIEF**

### **Violation of CAN-SPAM Act, 15 U.S.C. § 7704**

42. Microsoft realleges and incorporates by reference the allegations contained in paragraphs 1 through 35 above.

43. Microsoft is a provider of Internet access service. Microsoft enables users to access content, including proprietary content, electronic mail, and other Internet services.

44. Defendants initiated the transmission of unsolicited, bulk spam e-mail, which are commercial electronic messages, via the Rustock botnet, through Microsoft customers' computers and through Microsoft's computers, which are used in interstate and foreign commerce and communication, to thousands or millions of computers, which are also used in interstate and foreign commerce and communication and are "protected computers" as defined by 18 U.S.C. § 1030(e)(2)(B).

45. By sending messages via the Rustock botnet, Defendants initiated the transmission of commercial electronic mail messages, to protected computers that contained materially false or misleading header information in violation of 15 U.S.C. § 7704(a)(1).

46. Defendants initiated the transmission of commercial electronic messages to protected computers with actual or fairly implied knowledge that the subject headings of the messages would likely materially mislead recipients regarding the contents or subject matter of the message in violation of 15 U.S.C. § 7704(a)(2).

47. Defendants transmitted to protected computers commercial e-mail messages that did not contain a functioning return electronic mail address or other Internet-based mechanism that recipients could use to contact Defendants and indicate their desire to opt-out of future messages from Defendants, in violation of 15 U.S.C. § 7704(a)(3).

48. Defendants initiated the transmission to protected computers of commercial electronic messages that did not provide (a) clear and conspicuous identification that the

1 message was an advertisement or solicitation; (b) clear and conspicuous notice of the right to  
 2 decline to receive future message; or (c) a valid physical postal address of the sender, in  
 3 violation of 15 U.S.C. § 7704(a)(5).

4 49. Defendants' unsolicited, bulk e-mails were sent as part of a systematic pattern  
 5 and practice that did not conspicuously display a return electronic mail address by which the  
 6 recipients could submit to the true sender a reply requesting that no further commercial e-mails  
 7 be sent to the recipient.

8 50. As a direct result of Defendants' actions, Microsoft has suffered harm in an  
 9 amount to be determined at trial.

10 51. Microsoft is entitled to the greater of actual damages or statutory damages in  
 11 accordance with 15 U.S.C. § 7706(g)(1)(B).

12 52. On information and belief, Defendants' actions were willful and knowing,  
 13 entitling Microsoft to aggravated damages in accordance with 15 U.S.C. § 7706(g)(3)(C).

14 53. As a direct result of Defendants' actions, Microsoft has suffered and continues to  
 15 suffer irreparable harm for which Microsoft has no adequate remedy at law, and which will  
 16 continue unless Defendants' actions are enjoined.

### 17 **THIRD CLAIM FOR RELIEF**

#### 18 **Trademark Infringement Under the Lanham Act – 15 U.S.C. § 1114 *et. seq.***

19 54. Microsoft realleges and incorporates by this reference each and every allegation  
 20 set forth in paragraphs 1 through 35 above.

21 55. Defendants have used the Microsoft Marks in interstate commerce.

22 56. The Rustock botnet uses counterfeit copies of the Microsoft Marks in spam e-  
 23 mail, including through the software operating from and through the Command and Control  
 24 Servers. By doing so, Defendants are likely to cause confusion, mistake, or deception as to the  
 25 origin, sponsorship, or approval of the spam e-mail and material promoted through the spam e-  
 26 mail.

27 57. By using the Microsoft Marks falsely in connection with spam e-mail,  
 28 Defendants are likely to cause confusion, mistake, or deception as to the origin, sponsorship, or

1 approval of the e-mail sent by the Rustock Botnet.

2 58. As a result of their wrongful conduct, Defendants are liable to Microsoft for  
3 violation of this provision of the Lanham Act.

4 59. As a direct result of Defendants' actions, Microsoft has suffered and continues to  
5 suffer irreparable harm for which Microsoft has no adequate remedy at law, and which will  
6 continue unless Defendants' actions are enjoined.

7 60. Defendants' wrongful and unauthorized use of the Microsoft Marks to promote,  
8 market, or sell products and services constitutes trademark infringement pursuant to 15 U.S.C. §  
9 1114 *et seq.*

#### 10 **FOURTH CLAIM FOR RELIEF**

##### 11 **False Designation of Origin Under The Lanham Act – 15 U.S.C. § 1125(a)**

12 61. Microsoft realleges and incorporates by this reference each and every allegation  
13 set forth in paragraphs 1 through 35 above.

14 62. The Microsoft Marks are distinctive marks that are associated with Microsoft  
15 and exclusively identify Microsoft's business, products, and services.

16 63. The Rustock Botnet makes unauthorized use of the Microsoft Marks. By doing  
17 so, Defendants are likely to cause confusion, mistake, or deception as to the origin, sponsorship,  
18 or approval of the conduct, actions, products and services carried out by or promoted by  
19 Defendants and the Rustock Botnet, including software operating from and through the  
20 Command and Control Servers.

21 64. As a result of their wrongful conduct, Defendants are liable to Microsoft for  
22 violation of this provision of the Lanham Act.

23 65. As a direct result of Defendants' actions, Microsoft has suffered and continues to  
24 suffer irreparable harm for which Microsoft has no adequate remedy at law, and which will  
25 continue unless Defendants' actions are enjoined.

#### 26 **FIFTH CLAIM FOR RELIEF**

##### 27 **Trademark Dilution Under The Lanham Act – 15 U.S.C. § 1125(c)**

28 66. Microsoft realleges and incorporates by this reference each and every allegation  
COMPLAINT

1 set forth in paragraphs 1 through 35 above.

2 67. The Microsoft Marks are distinctive marks that are associated with Microsoft  
3 and exclusively identify Microsoft's business, products, and services.

4 68. The Rustock Botnet makes unauthorized use of the Microsoft Marks. By doing  
5 so, Defendants are likely to cause dilution by blurring and dilution by tarnishment of the  
6 Microsoft Marks.

7 69. As a direct result of Defendants' actions, Microsoft has suffered and continues to  
8 suffer irreparable harm for which Microsoft has no adequate remedy at law, and which will  
9 continue unless Defendants' actions are enjoined.

10 **SIXTH CLAIM FOR RELIEF**

11 **Common Law Trespass to Chattels**

12 70. Microsoft realleges and incorporates by this reference each and every allegation  
13 set forth in paragraphs 1 through 35 above.

14 71. Defendants' actions in operating the Rustock Botnet result in unauthorized  
15 access to the computers of Microsoft and its customers and result in unsolicited, bulk electronic  
16 mail being sent to, from or through the computers of Microsoft and its customers.

17 72. Defendants intentionally caused this conduct and this conduct was unauthorized.

18 73. Defendants' actions have caused injury to Microsoft and its customers and  
19 imposed costs on Microsoft and its customers, including time, money and a burden on the  
20 computers of Microsoft and its customers, as well as injury to Microsoft's business goodwill  
21 and diminished the value of Microsoft's possessory interest in its computers and software.

22 74. As a result of Defendants' unauthorized and intentional conduct, Microsoft has  
23 been damaged in an amount to be proven at trial.

24 75. As a direct result of Defendants' actions, Microsoft has suffered and continues to  
25 suffer irreparable harm for which Microsoft has no adequate remedy at law, and which will  
26 continue unless Defendants' actions are enjoined.

**SEVENTH CLAIM FOR RELIEF**

**Conversion**

76. Microsoft realleges and incorporates by this reference each and every allegation set forth in paragraphs 1 through 35 above.

77. Defendants have willfully interfered with and converted Microsoft's personal property, without lawful justification, as a result of which Microsoft has been deprived of possession and use of its property.

78. As a result of Defendants' actions, Microsoft has been damaged in an amount to be proven at trial.

79. As a direct result of Defendants' actions, Microsoft has suffered and continues to suffer irreparable harm for which Microsoft has no adequate remedy at law, and which will continue unless Defendants' actions are enjoined.

**EIGHTH CLAIM FOR RELIEF**

**Unjust Enrichment**

80. Microsoft realleges and incorporates by this reference each and every allegation set forth in paragraphs 1 through 35 above.

81. The acts of Defendants complained of herein constitute unjust enrichment of the Defendants at Microsoft's expense in violation of the common law.

82. Defendants accessed, without authorization, computers running Microsoft's software or computers which otherwise belong to Microsoft.

83. Defendants used, without authorization or license, the facilities of Microsoft's software and computers which belong to Microsoft to, among other acts, deliver malicious software, support the Rustock Botnet, infringe Microsoft's trademarks, deliver unsolicited, bulk e-mail and deceive users.

84. Defendants' actions in operating the Rustock Botnet result in unauthorized access to the computers of Microsoft and its customers and result in unsolicited, bulk electronic mail being sent to, from or through the computers of Microsoft and its customers.

1 85. Defendants profited unjustly from their unauthorized and unlicensed use of  
2 Microsoft's software and the computers of Microsoft and its customers.

3 86. Defendants had an appreciation and knowledge of the benefit they derived from  
4 their unauthorized and unlicensed use of Microsoft's software and the computers of Microsoft  
5 and its customers.

6 87. Retention by the Defendants of the profits they derived from their unauthorized  
7 and unlicensed use of Microsoft's software and the computers of Microsoft and its customers  
8 would be inequitable.

9 88. Defendants' unauthorized and unlicensed use of Microsoft's software and use of  
10 the computers of Microsoft and its customers have damaged Microsoft in an amount to be  
11 proven at trial, and Defendants should disgorge their ill-gotten profits.

12 89. As a direct result of Defendants' actions, Microsoft has suffered and continues to  
13 suffer irreparable harm for which Microsoft has no adequate remedy at law, and which will  
14 continue unless Defendants' actions are enjoined.

15 **PRAYER FOR RELIEF**

16 WHEREFORE, Plaintiff Microsoft prays that the Court:

- 17 1. Enter judgment in favor of Microsoft and against the Defendants.
- 18 2. Declare that Defendants conduct has been willful and that Defendants have acted  
19 with fraud, malice and oppression.
- 20 3. Enter a preliminary and permanent injunction enjoining Defendants and their  
21 officers, directors, principals, agents, servants, employees, successors, and assigns, and all  
22 persons and entities in active concert or participation with them, from engaging in any of the  
23 activity complained of herein or from causing any of the injury complained of herein and from  
24 assisting, aiding or abetting any other person or business entity in engaging in or performing  
25 any of the activity complained of herein or from causing any of the injury complained of herein.
- 26 4. Enter a preliminary and permanent injunction isolating and securing the botnet  
27 infrastructure, including the software operating from and through the Command and Control IP  
28 Addresses/Domains and placing that infrastructure outside of the control of Defendants or their



representatives or agents.

5. Enter judgment awarding Microsoft actual damages from Defendants adequate to compensate Microsoft for Defendants' activity complained of herein and for any injury complained of herein, including but not limited to interest and costs, in an amount to be proven at trial.

6. Enter judgment disgorging Defendants' profits.

7. Enter judgment awarding enhanced, exemplary and special damages, in an amount to be proved at trial.

8. Enter judgment awarding attorneys' fees and costs, and

9. Order such other relief that the Court deems just and reasonable.

Dated: February 8, 2011.

ORRICK, HERRINGTON & SUTCLIFFE LLP

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Attorneys for Plaintiff Microsoft Corp.

**DEMAND FOR JURY TRIAL**

Microsoft respectfully requests a trial by jury on all issues so triable in accordance with Fed. R. Civ. P. 38.

Dated: February 8, 2011.

ORRICK, HERRINGTON & SUTCLIFFE LLP

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Attorneys for Plaintiff Microsoft Corp.

## **Appendix A**

IP Addresses Of Command And Control Servers	Location Of The Data Centers Hosting Companies Where Defendants Have Placed The Command And Control Servers
204.45.118.202 204.45.118.250 204.45.119.2 204.45.119.10 204.45.119.18 204.45.119.26 204.45.119.34 204.45.119.42 204.45.119.50 204.45.119.74 204.45.119.82 204.45.119.90 204.45.121.18 204.45.121.34 204.45.121.42 204.45.121.50 204.45.121.58 204.45.121.130	<b>FDCservers.net, LLC</b>  141 W. Jackson Blvd., Suite 1135 Chicago, IL 60604  And/or  1500 Champa St. Denver, CO 80202  And/or  15204 Kishwaukee Valley Rd. Woodstock, IL 60098
69.197.144.138 69.197.158.250 69.197.161.34 173.208.143.194 173.208.154.90 204.12.192.250 204.12.217.42 204.12.217.250 204.12.237.202 204.12.243.34 204.12.243.42 204.12.243.58 204.12.248.66 208.110.82.186 204.12.217.218 69.197.158.242 173.208.131.178 173.208.141.154 173.208.143.90 173.208.163.242 173.208.163.178 204.12.217.218 204.12.217.98 173.208.128.50 173.208.143.114	<b>Wholesale Internet Datacenter LLC</b> <b>Wholesale Internet, Inc.</b>  324 E. 11th St. Suite 1000 Kansas City, MO 64106  And/or  1102 Grand Blvd, Suite 905 Kansas City, MO 64106

204.12.220.122 208.110.71.58	
64.120.144.69 64.120.149.117 64.120.153.117 64.191.38.165 64.191.53.37 64.191.59.245 66.96.224.213 66.197.161.181 66.197.251.69 96.9.180.21 96.9.182.101 96.9.182.197 96.9.183.149 66.96.214.53 173.212.243.114 64.191.18.149 173.212.214.194 173.212.241.42 173.212.241.50	<b>BurstNET Technologies, Inc.</b> <b>d/b/a Network Operations Center, Inc.</b>  420-422 Prescott Ave Scranton, PA 18510
96.0.203.82 96.0.203.90 96.0.203.98 96.0.203.106 96.0.203.114 96.0.203.122 173.83.26.26 173.83.26.34 96.9.169.53	<b>Ecommerce, Inc.</b>  1774 Dividend Dr Columbus, OH 43228
74.86.210.134 208.43.17.44 208.43.18.12 208.43.40.148 208.101.27.108 208.101.27.72 74.86.210.133 173.192.135.98 173.192.135.99 208.43.157.96 173.192.135.102 67.228.206.92 174.36.237.84 208.43.102.220	<b>Softlayer Technologies</b>  c/o Infomart Data Center Facility 1950 North Stemmons Freeway Dallas, TX 75207-3118  and  4030 Lafayette Center Dr. Chantilly, VA 20151  and

	c/o Sabey carrier hotel 3355 S. 120th Place Tukwila, WA 98168
98.126.42.26	<b>VPLS Inc. d/b/a Krypt Technologies</b>  1400 South Grand Ave Santa Ana, CA 92705  And/or  One Wilshire 624 South Grand Ave Los Angeles, CA 90017  And/or  600 West 7th Street, Suite 530 Los Angeles, CA 90017  And/or  800 South Hope Los Angeles, CA 90017
66.79.162.86 66.79.163.102 66.79.162.138	<b>DCS Pacific Star, LLC</b>  5050 El Camino Real, Suite 238 and/or 268 Los Altos, CA 94022
69.50.197.191	<b>Atjeu Publishing LLC / Atjeu Hosting LLC</b>  1515 West Deer Valley Road Bldg C-103 Phoenix, AZ 85027
98.141.220.194 98.141.220.226 76.161.33.58	<b>Reliable Hosting Services, LLP</b>  11513-19 Sunset Hills Road Reston, VA 20190
96.31.81.44	<b>Noc4Hosts Inc.</b>  4465 W. Gandy Blvd Suite 812 Tampa FL 33611



## **Appendix B**

## Domains and Registries

- **Registries:**

Verisign Naming Services  
21345 Ridgeway Circle  
4<sup>th</sup> Floor  
Dulles, VA 20166

Afilias USA, Inc.  
Building 3, Suite 105  
300 Welsh Road  
Horsham, PA 19044

- **Domains:**

gbsup.com  
djl004daiywyed62wd.me  
osg00aqslnpspyo.info  
pan00c4sshlwgi.info  
ovn00elprb15b6bodr.name  
db600rgsajryc.com  
pre015koynvhkiqja1.name  
pf703fuipluauo.com  
rj7069ht31wdyxettj.info  
cme070vafafcsr.info  
lpj07fyuft62nxdh.name  
fqw07sow85ofbe0.com  
aws07tb6sl38vv.me  
bap07yd2syajfp.name  
ldv07yiqrpjsju.com  
oe0a2atcb31tsrp07n.net  
qq70aixymnkxwclq.info  
voe0amt62theg.net  
afe0avd85efvdjy.name  
ri00b6e0rehe7762p70xr.net  
ts70brfttisf.name  
bv00cfxmngpir4dij.me  
irn0e5btrnv70oo.com  
he00e7sk62ycdhexbu.net  
i850eaqdpocbj77afc.net  
rff0edbdyjbeyl.name  
xwb0eikesriess54.name  
pwr0enkgc4ub54sn.net  
70c0epgigtgyv00xi.me  
31v0epoqpqwadnea1.com

07fhvk3feedeedwjr.me  
lgmhw46cbtfi46fuo.net  
93mhx1cvtbatljbx.name  
thuhxspadoa1.info  
r93hxwopfotn.me  
kdbhyqfyuwquf.info  
bsqi15fd2thom69kt.net  
qgni31wl77xwynoys.net  
axoi69jfoygso8c.info  
gvai69wwjsdobn.name  
5bei70leuqchbm.name  
edaiacf46ibua.com  
yhtiafiaytxybgm.net  
hkriahfrtbn31vba.name  
85sialfsscbdkrm.info  
dkxibhuabm0eho.me  
elkicmthxpmwscf.me  
dvbid2o77wglhv.net  
tsmidhbykgk231cu.name  
djiydw31jhukcbs.me  
rhcidye0c4drq.com  
uljiebve4dcmtyb.name  
j23ielacala862h.info  
h8ciej4693cmhuqff5.name  
iniieldgteui.info  
clffiduanticjho.com  
vgiifnd1cseedqrx.me  
85bifoeekdyjy.com  
rxgifurhf69sihy07.name  
vicigfwwxyq.info

mtibygfof5do.info  
fcibyx3fkor62rvm.info  
fmfc1cvmiqaa93gb.name  
olnc41cjbkndoyu69k.info  
ienc4abwr3fpc.name  
kelc4dupiijc.name  
4dnc4fdqnyjxjfkmb.name  
rbbc4jkvsfqoo.net  
wkpc4lrleomnil.info  
v9ac4mkttxfic4.name  
lvcc4xuuxkrhgc.name  
ihac4yrhcygb6xgr.name  
vsfc54dfubmfcbo.net  
ssxc54rw3f38lohf70.info  
yqdc62mkyww4dke.info  
2avc69oxr54kew15mt.net  
ykbc85rpntilcie7.me  
00kc8cjqbfcsd24dg.me  
ckmca1scbf31c.name  
wk8cabpuoxcwem.com  
fx8cacacuajpaij.net  
lb6cafwwsyeb6ggbp.com  
jqcatejfwrq.me  
hwtcawn15mksmjo.info  
hnmcaxosesqgogg.me  
oescb31ot46oer.me  
5bocb646xyhqcl.info  
85xcb7ekttb691cx.net  
2axcb93aminlfnaf.me  
3frcbafwb6dctvqgv.com

xim0eqvksjmp.net  
 bti0ermli07gb6mc4c.net  
 tgs0esgnaelnjm38.info  
 et70fhpbbitb.net  
 hj00fwppqblxgepn.name  
 rs00gfk8cejau.info  
 jpe0gm9ai00ifwdgsp.net  
 uoe0iojpfbvupqfbd.com  
 lj70klepssba.name  
 ri00kqte7ymldv4dd.com  
 jk70lifnetb1cd9h.com  
 lxe0lleeyd9bmjogt.info  
 twe0lplhbtsh.com  
 kre0nlxsnfca8kxmbi.net  
 nve0rspgf5buvur38t.name  
 dc00tvorlseveq.me  
 e000wb6bcinetp5b.com  
 bme0wkc93padne7cs.com  
 cde0ype7ve7hl15fug.info  
 uc31318cwvojm.name  
 nek1515wi31uqbbxkv.com  
 lji152aqrfixro.name  
 mtm1562dqwgfwyc.info  
 tpm15d3ftvnxipray.me  
 3fe15e7gwv85yagk.info  
 y7015ifdynrdys.info  
 cbp15oshnpw62m.com  
 fcq15rxcyuo15u.com  
 thd15wnh5bi8c.net  
 pfc15x00gxruigm.info  
 dwa15xxmkypkpfaa.me  
 xt319acc770erpwmbe.me  
 2aa1a1fafmlxbhbhc.name  
 wfl1cdicvmswbbb.net  
 cb61cgpdpwh1cjtj.info  
 uim1cgqohsd9lwap.name  
 pfa1d9mqnvoqj.com  
 aya1hdxcl00ax.me  
 tb31jqigvy5bo.name  
 tt31mynwlvkwlgwn.net  
 eb31ppvwwoa8af.info  
 gma1qceordc15.me  
 tva1re85jfa138shgb.com  
 kd31sh8c7eljd9cbmwa.me  
 rc31umxssden.net  
 pr31x9a0ejxyybj.com  
 vd31xl544dfddnfmme.me  
 ioa1xorbtfiqrbp.name  
 cop23acbw69iib.net  
 ibi23bhsseepqi.me

69oigxk85ruyqynq.info  
 liyihejbmsbm70.com  
 utxihynedjmlx0e.info  
 e70ihypdjhbq6jy.name  
 afgli62uvahi.info  
 15dlic4ufee700j.me  
 mxbiilxisdfjc62s.com  
 nuxikfcu5b9aerya1.me  
 ra8ikt70ajslesi.info  
 xnmim85iesswp.info  
 oynimtgowlfwwyj.me  
 aqrngxiskte23.me  
 l93ioo23mahd2afqot.com  
 fd9ioxknxxtypih.name  
 wbdipafhxddmdd2.me  
 3feipemhpovjghv.com  
 yofiqlmud07i.com  
 dwimc4vfcsshc.name  
 d2eisgxqp1cfc.info  
 ebtisicwjbcb.name  
 qwhitekamwkky.net  
 dhnitftxpdnff69acb.com  
 rehitynrea8pvsom0e.info  
 e7liu461cotctn69.com  
 gtniufnkkprqn.me  
 saoiuio7esujc.info  
 pxyiuljnc070eou.name  
 l85iuevjeagan93a.me  
 irsiv70bf4dlh.info  
 cqsiwkokuervp.net  
 euwixdkcb31ut.info  
 abpxe2aaa1ccih.com  
 vktixfrwwpbh.com  
 mcdixokemmjl15.info  
 m2aixglewyif5.info  
 cjdiy5wnerq.info  
 lknuyue15cwj.net  
 yqviyuihctn.net  
 kkjj00yeckvcgses.net  
 rkyj6907j3800d2rma.com  
 qulj69rlrlbxjib.me  
 a1cja0elcwprgsxv.name  
 v38jafaqbgtr5b.me  
 jgaafdkwplqc.net  
 70tjamx5bsuvrb31m.name  
 qppjanb6djpsscd2e.info  
 nvijb6umatfimsj.name  
 uh3jcbdhedunt.com  
 lljjcpaplc4p.info  
 nxjdotv4dhp.name

cjpgcbdafegahidx.com  
 uaqcbbhxxrypo.name  
 t15cbdcbouhfjxxdv.info  
 cqocbdtwd2wi3f3f.info  
 sedcbduxquqiqdh.com  
 jclcbepond2f.info  
 mn8cbfbda1f5omwiv.com  
 pxdcbhnpuugre.name  
 dmccbmvs85sjxxov.com  
 jlhcbbpqqeejcvfq.me  
 egmcbpupdebdgi.net  
 xawcbqa1ffpykv.name  
 f5fcbqm8cejmen.info  
 iwvcbrmnf31algcc.net  
 fltcbrrp62xpkub.net  
 p5bcbtpmbikhvfc4.me  
 m9acc46mr15lggeebm.me  
 i7ecclerxwnd.net  
 df5ccnq77xsoq.me  
 23cccqqmi62qa.net  
 x9accwwnpwqwuhyi.net  
 ec8cd2kriqfpc07th.name  
 mafcd946f70fe7a1u.info  
 vn1cdxckl85ry.net  
 kefceeasagf58csb.net  
 ssucegsfm1cj.com  
 csncejnhpvtat.me  
 0efcetqfcvowb.name  
 0eicfdoa8veoe.me  
 vi1cfid9aknqn2aa07.info  
 dlvcg93gpiio8c62.name  
 snxcgmoqwbcici.info  
 pnech8507kqlalw.com  
 b6dchspuf77bnbbde.info  
 xnjcibxhxeesdn.com  
 qe7cietqjha1mtx.me  
 mboclosskowfc.net  
 awbcivbncysq.me  
 prvcj15ux1ckxmuf.info  
 0eecjavbrkynx9aw.info  
 bj1cjwb6vjt93j.name  
 deucke7urpckf62ik.me  
 qldckerjaa1area1d.net  
 b7eckmvsd9djot.info  
 cbqcknde7bdudl3fkfx.com  
 23qclkhocyg8cxas.me  
 dfgclma93rvcbdxl.name  
 f5aclxwmd9dtn.name  
 h15cmbdclyowf.net  
 ibbcmcbbukseesb.com

kdt23gremasxlt.net  
 ria23lbsn23tcbg00dn.info  
 tai23nb6rv15kd.me  
 sff23o54xgle7kp.me  
 weu23p00wco00frt.com  
 xmf23poeewdf5bru.info  
 aym23uubhc4kd.me  
 bdd293iongsrcn38ot.me  
 jd62a23a1vlsfwdffc.net  
 ngb2a23uokcgra.me  
 lqp2aicjpnqjbdn.info  
 31o2akkknrtwjta0e.name  
 qbd2aqefaluut.me  
 dqd2aute7eud9i85.me  
 saf2avc7eqwhm00q.me  
 yhd2be7uupfon.me  
 dx62gucdurjm85.net  
 us62ialpkkijkivp.net  
 rc62l07cbfn703fwojux.com  
 sbd2mcjchjooqxxi.me  
 vi62pe7pa70dbe0pmn.com  
 xf62svlf31vfcwi3f.me  
 iad2und9c4slv77eymf.net  
 imd2uoxp6954vw.net  
 su62vdxcr62hny.info  
 cb62xbfpuixpde7eb.info  
 lf62xyh9aveaplxqc.info  
 l5b3123ojbmobsa8ylw.info  
 hqi3146mrv31gley.net  
 69p31envphfnn.me  
 jfg31gwasnbwkr.com  
 aab31mha5bwtgdeil.com  
 wmi31tfmbnhf1c.net  
 gp2331svxj69xj0e.net  
 wb63831qaa1a1eokm.com  
 jkp38cc859aed15vp.name  
 uae38gme7eirhcb07x.net  
 1cc38hmvsxf5imp.net  
 e0i38lehcgoftw.info  
 bbd38n69crspcw.net  
 fcc38nscrswwkxg.net  
 lvb38pre7bfxnlu.me  
 ecn38rjma8nc4c7evmo.name  
 ic93cdfxkddedqmx.com  
 lq93cw7emnjfdt.net  
 jn93edblxusbcpq.net  
 aw93eoq38x1chnijsb.info  
 raf3f70bqpv70cmd8c.name  
 bm23fafyjkpufysh.com  
 fw93fchcicu9aoj.me

n8cjdqhlcpfcu.info  
 kdajeedddoxph.name  
 xejjelwgc4a1dr93cq.com  
 i0ejenld2meyunc4fj.me  
 ulyjetxmtfwye7.name  
 tiejf54wx7ewg.name  
 dfjfxxybbe7f9a.com  
 k62jg3815xttdxki62.name  
 e93jgefycja1ae23.name  
 kipjgitscqwbbqcp.info  
 bkijgpuqkob6ggg.me  
 khpijgujie0fvjak.com  
 ca1jgxvqkahrwb.name  
 lotjhcv15dyfa8c.net  
 pjkhjtnse7cvnsm31.com  
 jaojikgf5hcor.net  
 vawjk8ccbogfccpn.name  
 huqjkagf4c31e7.info  
 mvejkuwgtqyd54s.net  
 rwkjl07qdybe7od9hh.me  
 hpklcedjbdq.net  
 mrljmdgdagry.info  
 lmijmissbx70kiq.net  
 jedjn31bgqmxaaj77.name  
 qyajn70ljkv5bibddb.me  
 brojodmncnoj.name  
 upyjofwf5wcdl.net  
 07ojonrpdwrwx54t.info  
 agtjorbdk77dak.me  
 kcgjp9axa8ooy.me  
 c1cjp0ecf569ibdj.net  
 fvjprtqrlgadh.net  
 vrejpsgtpcavv.name  
 yuijpta8yntj.name  
 gdkjptvxyiqyci38.com  
 fkmjpwud9lgcb.name  
 emnjrknbrore0.me  
 eejrsq2a07vbp.net  
 ykpjta1hb6sckos.com  
 fbcjtcjaobkicn.net  
 r2ajtepqe0ddd9c.com  
 evmjtmfamkbku.com  
 85fju46b2aeohtu0e.com  
 poujuh70ophrbr.net  
 obrjujwvqppof.net  
 qwdjvnc4ecgs.name  
 bdtjw31p8cb6axgl77.info  
 xkbjwpycpouuox.me  
 fekjwomhtqyss.me  
 lwvjxcydnatl.me

qvqcmibyac4teee.me  
 gl1cmoan4dxbaefp93.info  
 nfqcmurubqxq.com  
 jqmcnbuidrv.info  
 jrgcopjummqd9.info  
 gjccoqdehwdpxf.me  
 dcfcorns93k8cid2dq.name  
 vl1coxx38psbf.com  
 ehscoyeyfebs8c.info  
 bqfcpdjqrbruyxro.name  
 wpicpero85aes.name  
 etjcpgtlxkxfctkn.net  
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## **Appendix C**

**Int. Cls.: 9 and 42**

**Prior U.S. Cls.: 26, 38 and 101**

**United States Patent and Trademark Office**

**Reg. No. 1,200,236**

**Registered Jul. 6, 1982**

**TRADEMARK  
SERVICE MARK  
Principal Register**

**MICROSOFT**

Microsoft (partnership)  
Suite 819  
10800 NE. 8th  
Bellevue, Wash. 98004

VICES, in CLASS 42 (U.S. Cl. 101).

First use Nov. 12, 1975; in commerce Nov. 12, 1975.

For: COMPUTER PROGRAMS, in CLASS 9  
(U.S. Cls. 26 and 38).

Ser. No. 236,080, filed Oct. 22, 1979.

First use Nov. 12, 1975; in commerce Nov. 12, 1975.

B. H. VERTIZ, Primary Examiner

For: COMPUTER PROGRAMMING SER-

CHERYL LYNNE HENDERSON, Examiner

**Int. Cls.: 9 and 42**

**Prior U.S. Cls.: 26, 38 and 101**

**United States Patent and Trademark Office**

**Reg. No. 1,200,236**

**Registered Jul. 6, 1982**

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Principal Register**

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For: COMPUTER PROGRAMS, in CLASS 9  
(U.S. Cls. 26 and 38).

First use Nov. 12, 1975; in commerce Nov. 12, 1975.

Ser. No. 236,080, filed Oct. 22, 1979.

B. H. VERTIZ, Primary Examiner

For: COMPUTER PROGRAMMING SER-

CHERYL LYNNE HENDERSON, Examiner

**Int. Cls.: 35 and 38**

**Prior U.S. Cls.: 100, 101, 102 and 104**

**Reg. No. 2,165,601**

**United States Patent and Trademark Office**

**Registered June 16, 1998**

**SERVICE MARK  
PRINCIPAL REGISTER**

**HOTMAIL**

**HOTMAIL CORPORATION (CALIFORNIA  
CORPORATION)  
1290 OAKMEAD PARKWAY, SUITE 218  
SUNNYVALE, CA 94086**

**FOR: ADVERTISING AND MARKETING  
SERVICES, NAMELY, PROMOTING THE  
GOODS AND SERVICES OF OTHERS BY  
PLACING ADVERTISEMENTS AND PROMO-  
TIONAL DISPLAYS IN AN ELECTRONIC SITE  
ACCESSED THROUGH COMPUTER NET-  
WORKS AND BY DELIVERING ADVERTISE-  
MENTS AND PROMOTIONAL MATERIALS TO**

**OTHERS VIA ELECTRONIC MAIL, IN CLASS  
35 (U.S. CLS. 100, 101 AND 102).**

**FIRST USE 7-4-1996; IN COMMERCE  
7-4-1996.**

**FOR: ELECTRONIC MAIL SERVICES, IN  
CLASS 38 (U.S. CLS. 100, 101 AND 104).**

**FIRST USE 7-4-1996; IN COMMERCE  
7-4-1996.**

**SER. NO. 75-272,783, FILED 4-10-1997.**

**EDWARD NELSON, EXAMINING ATTORNEY**